



Could Education Corporation of America's Sudden Closure Have Been Avoided?

Earlier this month, another for-profit college chain closed abruptly, leaving more than 20,000 students and 4,000 GI Bill beneficiaries¹ wondering why this happened and how this will affect their future educational endeavors. On December 5, 2018, the Education Corporation of America (ECA) — which owns Virginia College, Ecotech, Golf Academy of America, Brightwood College, and Brightwood Institute — announced that it would shut down its 70 remaining campuses across the United States.²

Taxpayers are also impacted. In award year 2015-2016, ECA received more than \$350 million in taxpayer funds from the U.S. Department of Education, as well as more than \$41 million in taxpayer funds from the U.S. Department of Veterans Affairs (VA) in FY 2017³ and another \$43,212 under the Department of Defense's Tuition Assistance Program for active duty military. Beyond those outlays, taxpayers will also have to bear the upcoming costs of the Education Department's obligation to grant "[closed school discharges](#)" of existing student loans held by current ECA students who do not transfer to a comparable program at a new school. Taxpayers are already on the hook for more than \$300 million in closed school discharges from shuttered schools, such as Corinthian and ITT Technical Institutes,⁴ a number that is likely to grow with necessary relief for ECA students. VA will also be responsible for reinstating the current term of GI Bill benefits to students who were attending ECA at time of closure if they opt not to transfer,⁵ adding even more to the financial hit on taxpayers.

Unfortunately, ECA is another example of history repeating itself. Americans have watched other large for-profit college chains shutter their doors to students without warning over the past few years, most notably Corinthian Colleges and ITT Tech.⁶ While students and faculty were not aware of the pending closing until the day it happened, there were significant warning signs for many years that ECA was on the brink of failure.

Could the Education Department, and possibly even VA, have helped ECA students avoid the disruption of a sudden closure and saved hundreds of millions of federal taxpayer dollars by heeding the warning signs?

Warning Sign #1: Dismal Student Outcomes at ECA Institutions

In order to better understand the warning signs at ECA prior to its sudden closure, Veterans Education Success analyzed the student outcomes at ECA campuses.

As of 2015-16, ECA owned 22 institutions with 70 branch campuses across the United States. While most of these

students (57.8 percent) ended up earning a credential or degree within eight years of entering,⁷ a majority of their earned credentials ended up being worth no more than a high school diploma. For example, of the 55,064 students who entered an ECA institution in 2007-2008, only one in three (35.7 percent) would end up earning more than \$25,000 in 2013-2014 — less than the average high school graduate and a substantially worse outcome than similar certificate-and degree-granting institutions.

Most students paid \$20,000 to attend an ECA campus every year — even after grants and scholarships; yet they earned less than the average high school graduate after leaving school. As a result, it's not surprising that a high proportion of students left ECA with unmanageable debt. In fact, of the 68,844 students who left an ECA school in 2012-2013 and entered repayment on their federal debt, only one in five (21.4 percent) were able to pay down even \$1 on their loan principal three years later, meaning they actually owed more on the amount they initially borrowed.

Additionally, 20 percent of students faced one of the worst outcomes after attending, ultimately defaulting on their loans within just three years of leaving an ECA school, and putting their financial future in jeopardy. A December 2018 [report](#) by Veterans Education Success provides a detailed examination of outcome measures for three ECA campuses, including five-year student default rates. For example, between year three and five, the default rate among former Brightwood students almost doubled at its San Diego campus, and its criminal justice program was at risk of failing the Education Department's Gainful Employment test.

Warning Sign #2: Degree Programs at Many ECA Campuses Did Not Lead to a Job

Beyond low earnings and unmanageable debt, many ECA students discovered, upon graduating, that they were not even eligible to obtain a license in the occupation they had been promised. A [2015 report](#) by Veterans Education Success found that 20 percent of the degree programs it examined failed to prepare graduates for the licensure or certification required to get the career veterans were promised.⁸ Many of these programs were at institutions owned and operated by ECA.

In December 2016, Congress addressed this failing, by enacting [P.L. 114-315](#). Section 409 of the law prohibits GI Bill participation by school degree programs that fail to meet state licensure and certification requirements, including law schools that are not accredited by the American Bar Association.

To ensure that the law had been successfully implemented, Veterans Education Success examined the status of these same degree programs in early 2018. Our April 2018 [report](#) found that half of the problematic degree programs we identified in 2015 were *still* enrolling veterans (despite the statutory prohibition) and that the number would likely be higher had some schools not closed in the interim.⁹

ECA was prominent among these improperly-approved programs. Nineteen of the 32 programs that failed to meet state licensure and certification requirements and were still enrolling veterans in early 2018 were dental assisting diplomas offered by Brightwood College campuses owned by ECA. Moreover, we identified an additional 49-degree programs that were GI Bill-eligible in 2018, but failed to meet the requirements of P.L. 114-315, including 33 Brightwood campuses offering diplomas in dental and medical assisting. Overall, 31 of approximately 40 Brightwood College campuses offered degree programs that did not lead to state licensure or certification.

Without doubt, had VA or its state agents (the State Approving Agencies) withdrawn GI Bill eligibility of these ECA degree programs, as required by statute, fewer GI Bill students would have been affected when the company announced in December that it was closing. Those students would have been spared the trauma of mid-semester disruption (which is particularly hard on veterans who rely on the GI Bill's monthly housing allowance) and the hardship of seeking to transfer credits, obtaining a closed school discharge for federal student loans, or applying for a limited restoration of their GI Bill benefits (for the current term, only). They will never be compensated, however, for the time and energy they wasted pursuing these worthless degrees.

Warning Sign #3: ECA Colleges Lacked a Respected Accreditor

Despite dismal student outcomes and even ineligibility for promised occupations, its accreditor — the Accrediting Council for Independent Colleges and Schools (ACICS) — took no serious actions at ECA-owned campuses prior to 2018, putting students and taxpayers at risk of wasting their time and money at schools that show little to no return on investment.¹⁰

In December 2016, following strong recommendations from career civil servants at the Education Department, as well as from a bipartisan independent advisory committee under its auspices, U.S. Education Secretary John B. King formally terminated ACICS.¹¹ In addition to ECA, ACICS had also provided its stamp of approval to ITT and Corinthian and to a college raided by the FBI (with its college president now serving 96 months in federal prison).¹² Education Department career staff found ACICS out of compliance on 21 federally-mandated criteria. The staff report noted that ACICS was “entirely lacking or incoherent” on the standards regarding student achievement and had failed to meet the

requirements regarding monitoring of colleges, enforcement of accreditor rules when a college was in violation, and other failures.¹³ In fact, data show that the colleges ACICS approves offer their students a substantially lower likelihood of finding stable employment, which leaves most former students unable to pay down their loans.¹⁴

Most ACICS-approved schools found new accreditors when ACICS was formally terminated in December 2016 and ACICS-accredited schools had 18 months to find a new accreditor. But ECA was among 85 schools that remained accredited by the discredited ACICS, a likely indication that no other accreditor was willing to approve its schools.¹⁵

ACICS has shown itself to be a bad steward of taxpayer dollars and an ineffective arbiter of educational quality. However, Education Secretary Betsy DeVos and her political appointees at the Department have bent over backwards to resurrect ACICS, even blatantly fabricating public support from other accreditors.¹⁶ Secretary DeVos officially reinstated ACICS in November 2018 — despite the negative consequences for students and taxpayers.¹⁷ Ineffective oversight by ACICS likely forced thousands of students who attended ECA institutions to either find another institution willing to accept their credits — which most are unlikely to do — or seek discharge of their loans, leaving them worse off than if they hadn't enrolled in the first place.¹⁸

Warning Sign #4: Student Complaints against ECA

Another warning sign is student complaints. Nearly two dozen student veterans filed complaints with VA over the past several years against ECA-owned schools.¹⁹ A review of their complaints on VA's GI Bill Comparison Tool shows that ECA's handling of tuition and fees and ECA's educational quality were the main complaint topics. While veterans' complaints to VA are redacted from public view, at least one veteran also sought help from Veterans Education Success, and his complaint follows:

“After 2 years at Virginia College, I was dropped from school the day before finals. I was told I owed \$1,400 plus. So I fell short 16 credits from graduating. I was in school on the Post 9/11 GI Bill.”²⁰

If other veterans filed similar complaints, and given existing data about student outcomes and improperly-approved programs that left graduates ineligible for their promised occupation, the lack of oversight by VA and its State Approving Agencies warrants concern.

The Education Department's Federal Student Aid office also receives and tracks student complaints, although it does not publicly share the number or type of complaints it receives about particular schools. The Department is obligated to publish an annual report on these student complaints,²¹ although it apparently has failed to do so since December 2016. In its December 2016 report, the Education

Department wrote: “Although proprietary schools distribute only 18 percent of the federal loans and grants in AY16 [Academic Year 2015-2016], these schools account for 44 percent of school-related complaints.”²² Therefore, although the Education Department may have received complaints from ECA, the Department has yet to release this information or take any action.

Warning Sign #5: ECA Was Overly-Reliant on Taxpayer Support

Like many for-profit college chains, ECA relied heavily on federal dollars to fund its operations (including its call center recruiting, advertisements, and high corporate executive compensation and perks). As noted above, ECA took more than \$391 million in taxpayer-funded federal student aid and veterans and military education benefits in the single most recent reported year. In fact, 15 of 22 ECA institutions received more than 80 percent of their revenue from Education Department federal student aid and Pell grants. And seven of these institutions were more than 85 percent dependent on Education Department funds, alone.²³

Congress attempted to prevent exactly this kind of over-reliance on federal taxpayer funds in the Higher Education Act,²⁴ wherein it required proprietary colleges to prove market viability by attracting at least 10 percent private paying students. However, because of an inadvertent²⁵ loophole in the statute (the “90/10 loophole”), VA and Pentagon funds were not enumerated, and proprietary schools have manipulated this loophole, unreasonably, to count VA and Defense Department funds as “private,” “non-federal funds,” effectively allowing taxpayer dollars to act as corporate welfare for proprietary colleges that are almost entirely dependent on federal money.²⁶

Moreover, because of their manipulation of this loophole, proprietary colleges are financially incentivized to seek out GI Bill and Defense Department Tuition Assistance to offset the 90 percent cap on Education Department funds. The result has been many years of aggressive and deceptive recruiting and marketing to veterans and servicemembers.²⁷

ECA’s reliance on veterans’ and servicemembers’ benefits was clear: ECA ranked 7th overall in the nation among all colleges in terms of the amount of GI Bill tuition and fees it received from FY 2009 through FY 2017, at a whopping \$495 million – nearly half a billion dollars.²⁸ Similarly, ECA relied on \$303,631 from U.S. Defense Department Tuition Assistance for active duty servicemembers from FY 2014 through 2017, alone.²⁹

If federal taxpayer funds flowing through VA and the Defense Department had been included in the 90/10 calculation, as veterans’ organizations and many Members of Congress have urged, ECA’s overreliance on federal grants and loans would have been even more starkly noted and it likely would have

fallen out of compliance and been cut off from Education Department funds.

Even if the 90/10 loophole were not closed by Congress, the Education Department bears responsibility for keeping an eye on schools’ federal dependency. The Education Department receives reports on schools’ overall dependency on federal funds, including the GI Bill and Defense Department Tuition Assistance, but so far has refused Congressional calls to release the data this year,³⁰ although it did release such data under the previous Administration.³¹

Warning Sign #6: Other Indications of Financial Instability and an Unsustainable Business Model

According to the Education Department’s Federal Student Aid data, ECA institutions have been listed on [Heightened Cash Monitoring 1](#) at the Education Department over concerns about the school’s “Administrative Capacity”³² since June 1, 2015. Nevertheless, federal funds continued to flow to the chain.

Despite its concerns about ECA’s administrative capacity, the Department apparently failed to obtain a letter of credit from ECA, as it has done on other colleges, thereby putting taxpayers on the hook for all ECA student losses. For example, in the case of ITT Tech, the Education Department had required an \$80 million letter of credit in 2014 (representing 10 percent of the Title IV aid funding ITT had received during the preceding fiscal year); in 2016, the Department asked ITT for an additional \$44 million, bringing the total to \$124 million. By the time ITT closed in September 2016, the Department had secured \$95 million of the \$124 million that it had required ITT put up,³³ which helped lessen the impact on taxpayers. One public complaint at the time of ITT’s closure was that the Department had failed to secure enough credit prior to ITT’s closure.³⁴

In the case of ECA, the Department did absolutely nothing to protect taxpayers from ECA’s failure, despite its statutory obligation to carefully protect the federal taxpayer dollars under its authority.³⁵

Moreover, the Education Department could have recognized that ECA’s business model was unsustainable because the financial data ECA regularly reported to the Department showed ECA was spending very little on student instruction, raising red flags about whether students were receiving the education taxpayers were paying for. An analysis of IPEDS data on ECA colleges’ revenue sources and expenditures shows that both Brightwood College and Virginia College spent less than 21 percent of tuition on instruction, far below the national norm of college spending on instruction. ECA’s spending priorities may well help explain ECA’s dismal student outcomes and inability to attract sufficient numbers of private-paying students. At a minimum, it should have drawn federal scrutiny.

Conclusion

The Education Department allowed a subprime college accreditor, ACICS, to act as a gatekeeper of federal funds, and both VA and the Education Department ignored several red flags about ECA, including (1) its dismal outcomes that left its former students with minimal job prospects and unmanageable debt, (2) its operation of programs that left students ineligible for the promised occupations, which should not have been approved for GI Bill, per federal statute, but nevertheless were; (3) its dangerous dependency on federal taxpayers to fund its operations; (4) its decision to spend less than 21 percent of its tuition on instruction (far below the national norm); (5) its student complaints; and (6) its financial and administrative precariousness.

Both VA and the Education Department have statutory obligations to serve as careful stewards of taxpayer funds – and, in the case of VA, to protect student veterans – obligations that were not met in the case of ECA.

For many years, veterans and military service organizations have urged VA to adopt risk-based reviews of schools receiving GI Bill funds³⁶ (also required by the federal

Principles of Excellence³⁷). And, if risk-based reviews had been implemented for ECA campuses, ECA's business problems, dismal student outcomes, and improperly-approved programs that left GI Bill students ineligible for their promised occupation – in violation of a federal statute governing the GI Bill – could have garnered sufficient federal attention to warrant taking action to protect GI Bill students.

The Education Department's failure is especially acute because it never required ECA to post a letter of credit, despite significant warning signs. Ultimately, taxpayers will now bear the financial cost of ECA's failure.

Congress also bears responsibility. If it had held accreditors accountable and also closed the 90/10 loophole, the wasted efforts of 20,000 ECA students and 4,000 GI Bill beneficiaries could have been avoided. And, if Congress fails to put better safeguards in place during its next reauthorization of the *Higher Education Act*, history will likely repeat itself as it has since the creation of the original GI Bill.³⁸ ECA may not be the last time we see a large for-profit college chain close its doors without notice, leaving students and taxpayers to pick up the pieces.



¹ See Andrew Kreighbaum, "Collapse of For-Profit Chain Long in the Making," *Inside Higher Ed* (Dec. 6, 2018), available at <https://www.insidehighered.com/news/2018/12/06/closure-education-corporation-america-raises-questions-about-oversight-and-support>; see also United States, U.S. Department of Veterans Affairs, "GI Bill Comparison Tool Data," available at <https://www.va.gov/gi-bill-comparison-tool>

² See Andrew Kreighbaum, "Collapse of For-Profit Chain Long in the Making," *Inside Higher Ed* (Dec. 6, 2018), available at <https://www.insidehighered.com/news/2018/12/06/closure-education-corporation-america-raises-questions-about-oversight-and-support>. ECA also owns the New England College of Business, which will remain open and is separately accredited (not by ACICS).

³ U.S. Department of Education, "Accreditor Data File" (May 22, 2018); see also U.S. Department of Veterans Affairs, "GI Bill Comparison Tool Data" available at <https://www.va.gov/gi-bill-comparison-tool>. The data include total Post-9/11 tuition and fees and Yellow Ribbon Program payments made to schools.

⁴ Michael Stratford, "DeVos cancels \$150M in student loan debt after losing court battle," *Politico* (Dec. 13, 2018), available at: <https://www.politico.com/story/2018/12/13/betsy-devos-student-loans-1063442>. See also, U.S. Department of Education, "American Career Institution Borrowers to Receive Automatic Group Relief for Federal Student Loans" (Jan. 13, 2017), available at: <https://www.ed.gov/news/press-releases/american-career-institute-borrowers-receive-automatic-group-relief-federal-student-loans>; US Department of Education, "Fourth Report of the Special Master for Borrower Defense to the Under Secretary" (June 29, 2016), available at: <https://www2.ed.gov/documents/press-releases/report-special-master-borrower-defense-4.pdf>

⁵ Public Law 115-48, section 109.

⁶ See, e.g., Veterans Education Success, "The ITT Collapse: Lessons Learned and Dealing with Future Challenges" (2016), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/58b8648ee58c624c6814bd1c/1488479376601/ITT+White+Paper.FINAL.pdf>

⁷ U.S. Department of Education, "Accreditor Data File" (May 22, 2018). All data in this section was calculated from the Accreditor Data File by the Edvisors Group Inc. The completion rate is calculated using Outcome Measures from the Accreditor Data File.

⁸ See Veterans Education Success, "The GI Bill Pays for Degrees That Do Not Lead to a Job" (Sept. 2015), available at: <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/57eaa61197aea4f38f19f02/1475258978479/GI+Bill+Pays+for+Degrees+That+Do+Not+Lead+to+a+Job+%283%29.pdf>

⁹ See Veterans Education Success, "Despite a 2016 Statute, the GI Bill Still Pays for Degrees That Do Not Lead to a Job" (April 2018), available at: <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5c16e0194ae23769a91b59e1/1545003033805/2018+Career+Ready+Update+Report+GI+Bill+Still+Pays+for+Degrees+That+Do+Not+Lead+to+a+Job.pdf>

¹⁰ "Council Actions." Accrediting Council for Independent College and Schools, webpage, available at: <http://www.acics.org/councilactions.aspx>

¹¹ See U.S. Department of Education, Decision of the Secretary, Docket No. 16-44-O (Dec. 12, 2016), available at <https://www2.ed.gov/documents/acics/final-acics-decision.pdf>.

¹² See Veterans Education Success, "Issue Brief #5: Student Outcomes at Colleges Approved by the Accreditor ACICS" (Oct. 2018), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5bbf8e8ce79c7079cedfe589/1539280525168/ACICS+Issue+Brief.FINAL.pdf>

¹³ See U.S. Department of Education, Decision of the Secretary, Docket No. 16-44-O (Dec. 12, 2016), *available at* <https://www2.ed.gov/documents/acics/final-acics-decision.pdf>.

¹⁴ See Veterans Education Success, "Issue Brief #5: Student Outcomes at Colleges Approved by the Accreditor ACICS" (Oct. 2018), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5bbf8e8ce79c7079cedfe589/1539280525168/ACICS+Issue+Brief.FINAL.pdf>

¹⁵ See Center for American Progress, "The 85 Colleges That Only ACICS Would Accredite," (July 3, 2018) *available at*

<https://www.americanprogress.org/issues/education-postsecondary/news/2018/07/03/453079/85-colleges-acics-accredit/>

¹⁶ See Veterans Education Success, "Issue Brief #5: Student Outcomes at Colleges Approved by the Accreditor ACICS" (Oct. 2018), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5bbf8e8ce79c7079cedfe589/1539280525168/ACICS+Issue+Brief.FINAL.pdf>

¹⁷ See Laura Meckler, "Betsy DeVos reinstates controversial gatekeeper of for-profit colleges," *Washington Post* (Nov. 21, 2018), *available at*: https://www.washingtonpost.com/local/education/betsy-devos-reinstates-controversial-gatekeeper-of-for-profit-colleges/2018/11/20/1c84faf6-ed18-11e8-96d4-0d23f2aead09_story.html?utm_term=.aed2cd52df49

¹⁸ U.S. Government Accountability Office, "Higher Education: Students Need More Information to Help Reduce Challenges in Transferring College Credits" (Sept. 13, 2017), *available at*: <https://www.gao.gov/products/GAO-17-574>

¹⁹ U.S. Department of Veterans Affairs, "GI Bill Comparison Tool Data" *available at* <https://www.va.gov/gi-bill-comparison-tool>.

²⁰ VA student complaint claim # 4885, on file at Veterans Education Success.

²¹ See Presidential Memorandum: Student Aid Bill of Rights (March 10, 2015), *available at* <https://obamawhitehouse.archives.gov/the-press-office/2015/03/10/presidential-memorandum-student-aid-bill-rights>

²² U.S. Department of Education, Federal Student Aid, "Federal Student Aid Feedback System Preliminary Report" (Dec. 2016), *available at* <https://studentaid.ed.gov/sa/sites/default/files/fsawg/datacenter/library/feedback-system-prelim-report.pdf>

²³ *Ibid.*

²⁴ See Section 487(a) of the Higher Education Act of 1965, as revised and codified at 20 USC 1094(a)(24).

²⁵ See generally Daniel Golden, "For-Profit Colleges Target the Military" *Bloomberg* (Dec. 30, 2009), *available at* <https://www.bloomberg.com/news/articles/2009-12-30/for-profit-colleges-target-the-military> (recounting legislative history).

²⁶ Two dozen state Attorneys General wrote to Congress objecting to this accounting practice. See Letter to Sen. Patty Murray, *et. al*, from Kentucky Attorney General Jack Conway, *et. al* (May 29, 2012), *available at* https://www.iowaattorneygeneral.gov/media/cms/Schools_4_profit_924BF51B5599F.pdf.

²⁷ See Veterans Education Success, "Research Report: Department of Education Data Shows Increased Targeting of Veterans and Servicemembers, Highlighting Urgency of Closing 90/10 Loophole" (Nov. 2017), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5a043bdfc83025336298845f/1510226911840/VES+90%3A10+Report+-+FINAL.pdf>; see also United States, U.S. Department of Veterans Affairs, "GI Bill Comparison Tool Data," *available at* <https://www.va.gov/gi-bill-comparison-tool>; and, Hollister Petraeus, For-Profit Colleges, Vulnerable GIs," *New York Times* (Sept. 21, 2011), *available at* <https://www.nytimes.com/2011/09/22/opinion/for-profit-colleges-vulnerable-gis.html>

²⁸ See Veterans Education Success, "Schools Receiving the Most Post-9/11 GI Bill Tuition and Fee Payments Since 2009," *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5ab2a76b6d2a73a4746063ef/1521657708194/GI+Bill+Cumulative+Revenue+Brief+%232+March2018.FINAL.pdf>.

²⁹ This number includes the FY 2014 numbers from Virginia College (\$74,039 for 35 TA recipients) archived on the Department of Defense's website, *available at* <https://www.dodmou.com/TADECIDE> under "Archive DoD TA Data." No other ECA college TA numbers were included from FY 2014, as the only one available in the archived data is Virginia College, and not Brightwood College.

³⁰ See Letter to U.S. Education Secretary Betsy DeVos from Sen. Dick Durbin, Rep. Mark Takano, *et. al*. (Dec. 10, 2018), *available at* <https://www.durbin.senate.gov/imo/media/doc/90.10%20Data%20Request%20Letter%20to%20Devos%20Signed%2012.10.18.pdf>.

³¹ See US Education Department, "New Analysis Finds Many For-Profits Skirt Federal Funding Limits" (Dec. 21, 2016), *available at* <https://www.ed.gov/news/press-releases/new-analysis-finds-many-profits-skirt-federal-funding-limits>.

³² U.S. Department of Education, "Heightened Cash Monitoring," *available at*: <https://studentaid.ed.gov/sa/about/data-center/school/hcm>

³³ See Veterans Education Success, "The ITT Collapse: Lessons Learned and Dealing with Future Challenges" (Oct. 2016), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/58b8648ee58c624c6814bd1c/1488479376601/ITT+White+Paper.FINAL.pdf>

³⁴ *Id.*

³⁵ See generally 20 U.S.C. § 3402; section 141(b)(2)(vi) of the Higher Education Act.

³⁶ See, e.g., Letter to VA Secretary Bob McDonald, from Lt. Gen. Dana Atkins, *et. al* (May 16, 2016), *available at*: <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5744bdfc2eeb81f2ceb68358/1464122877006/VSO+MSO+Letter+to+VA+Secretary+re+GI+Bill+oversight.Signed+%281%29.pdf>; Gardiner Harris, "Veterans Groups Seek a Crackdown on Deceptive Colleges," *New York Times* (May 21, 2016), *available at* <https://www.nytimes.com/2016/05/22/us/politics/veterans-groups-seek-a-crackdown-on-deceptive-colleges.html?ref=topics&r=0>.

³⁷ See Executive Order 13607, "Establishing Principles of Excellence for Educational Institutions Serving Servicemembers, Veterans Spouses, and Other Family Members," at Sec. 4(d), *available at*: <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5568cbbce4b08ba3e80019be/1432931260094/Executive-Order-13607.pdf>.

³⁸ See The Century Foundation, "The Cycle of Scandal at For-Profit Colleges" (2017), *available at* <https://tcf.org/topics/education/the-cycle-of-scandal-at-for-profit-colleges/>; "Truman, Eisenhower, and the First GI Bill Scandal" (2017), *available at* <https://tcf.org/content/report/truman-eisenhower-first-gi-bill-scandal/>.